



**Date:** April 7, 2017

**TO:** 19 Performance Measurement Counties (PMC)  
39 Non Performance Measurement Counties (Non-PMC)  
CalFresh Operations Bureau

**SUBJECT/PURPOSE:** Quality Control (QC) Guidance based on the USDA-FNS  
Quality Control Integrity Review (QCIR) FFY 2016  
Revised to 7 Findings

**RELATED REFERENCE:** None

**SUPERSEDES:** None

**EFFECTIVE DATE:** Effective Immediately

**BACKGROUND:**

On January 27, 2017, the California Department of Social Services (CDSS) received confirmation from the U.S. Department of Agriculture-Food and Nutrition Service (USDA-FNS) that its first Quality Control Integrity Review (QCIR) findings were reduced from 26 findings to 7. As such, we are reminding all counties to follow this guide to stay in compliance with any future QC Integrity Reviews.

**QC Guidance****Finding #1 – Error Review Panel (ERP)**

Counties must review its implementation of any ERP meetings in which QC error cases are discussed and ensure that the following is occurring:

- All ERP meetings must be held after cases have been transmitted to FNS
- Discussions at the ERP meetings must only be used for future corrective action planning after case results have been transmitted to FNS.

CDSS has enclosed its FFY 2017 transmission calendar for Active and Negative cases that specifically informs counties of when cases are transmitted to FNS. The last column, titled “**Transmission of Changed Cases to FNS**” on the Active transmission calendar and “**Cases Released in SNAP-QCS**” on the CAPER transmission calendar are the columns that indicate when cases are considered **transmitted to FNS**.

## **Finding #2 – Bias and Error Letters**

State and County Quality Control teams will inform counties and certification offices of any QC error findings via case disposition letters after QC cases have been transmitted or released to FNS. Any deviation from this process will violate FNS's expectation to eliminate bias as referenced in QC Policy Memo 16-02 and the FNS 310, Section 154.

## **Finding #3 – Documentation**

Counties must include all documents in the QC file submitted to FNS. These include but are not limited to re-reviewer notes, 3<sup>rd</sup> party consultant notes/comments, and handwritten review sheets along with all documentation used throughout the QC review process as referenced in Section 16(c)(4)-(5) of the Food and Nutrition Act and 7 CFR 275.4(a).

## **Finding #4 – Bias and Submitting cases on time to be re-reviewed**

Counties must adhere to the submission dates on first column titled “**Due to SQC for Re-review**” from the Active and CAPER transmission calendars in order to comply with case processing timeframes that allow for each QC case to be re-reviewed. Counties that continue to submit cases untimely will be subject to future escalation protocols.

## **Finding #5 – Bias and QC's function to directly reduce errors**

In an effort to eliminate the potential for any bias, all counties must take the necessary steps to ensure all error reduction activities (corrective action) related to errors, will focus on improving processes at certification, mid-period reporting, and recertification, but only after QC cases have been transmitted to FNS as referenced in QC Policy Memo 16-02.

**It is not the responsibility for any QC reviewer or supervisor to ensure a county's error rate be held artificially low. Any such mitigation activities discovered by CDSS and/or FNS will be subject to future escalation protocols.**

## **Finding #6 – Bias and the QC interview**

State and County QC reviewers must ensure that no bias is introduced into the QC review process whether intentionally or not intentionally. The QC reviewer must confirm that any assistance from the County to provide translation with participants do not include the eligibility worker or supervisor that authorized CalFresh benefits for that participant. Counties must readily make available language translation services for QC reviews when requested.

## **Finding #7– Documentation and the manually completed FNS 380**

Counties must ensure that all manually completed FNS 380 worksheets and any other case notes must be included in all QC files sent to FNS.

Any additional inquiries related to QC Transmittal 17-02 may be directed to Chris Alivio, CalFresh QC Manager.

**INQUIRIES:**            **Chris Alivio,**  
                                 **CalFresh QC Manager**  
                                 [Chris.Alivio@dss.ca.gov](mailto:Chris.Alivio@dss.ca.gov)

A handwritten signature in blue ink that reads "Tami Gutierrez". The signature is written in a cursive, flowing style.

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**Tami Gutierrez, Chief**  
**CalFresh Operations**